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6 *Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities  
7 Commission and the California Office of Energy Infrastructure Safety*

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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 In re:

14 PG&E CORPORATION,

15 -and-

16 PACIFIC GAS AND ELECTRIC  
17 COMPANY,

18 Debtors.

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20  Affects PG&E Corporation  
21  Affects Pacific Gas and Electric Company  
22  Affects both Debtors

23 \* *All papers shall be filed in the lead case,  
24 No. 19-30088 (DM)*

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Bankr. Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administrated)

**AFFIDAVIT OF WILLIAM B.  
ABRAMS IN SUPPORT OF MOTION  
OF WILLIAM B. ABRAMS  
PURSUANT TO BANKRUPTCY  
RULE 5004 AND 28 U.S.C. SECTION  
144 AND 455 AND BANKR. LOCAL  
RULE 3-14 FOR ENTRY OF AN  
ORDER AUTHORIZING THE  
RECUSAL OF THE HONORABLE  
DENNIS MONTALI**

**AFFIDAVIT OF WILLIAM B. ABRAMS IN SUPPORT OF MOTION OF WILLIAM B.  
ABRAMS PURSUANT TO BANKRUPTCY RULE 5004 AND 28 U.S.C. SECTION 144 AND  
455 AND BANKR. LOCAL RULE 3-14 FOR ENTRY OF AN ORDER AUTHORIZING THE  
RECUSAL OF THE HONORABLE DENNIS MONTALI**

William B. Abrams, being duly sworn, deposes and says:

1. I am over 18 years of age, of sound mind and otherwise competent to make this Affidavit. The evidence set out in the foregoing Affidavit is based on my personal knowledge.

2. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a Pro Se party to promote and collaborate with core parties in good-faith towards a plan, PG&E Fire Victim Trust Agreement and to ensure prudent Trust oversight that provides just settlements for all claimants as well as adequate restructuring for Pacific Gas and Electric Corporation so our communities are safe from the growing risks of utility-caused wildfires.

3. I submit this affidavit in support of the "MOTION OF WILLIAM B. ABRAMS PURSUANT TO BANKRUPTCY RULE 5004 AND 28 U.S.C. SECTION 144 AND 455 AND BANKR. LOCAL RULE 3-14 FOR ENTRY OF AN ORDER AUTHORIZING THE RECUSAL OF THE HONORABLE DENNIS MONTALI" (the "Motion") filed concurrently herewith.

4. After the PG&E Fires of 2017, I was compelled to engage as a party to certain proceedings at the California Public Utilities Commission to work collaboratively towards solutions that address wildfire mitigation, climate change adaptation and other utility/energy challenges. Some of these proceedings are related to this case. All of my filed comments are in the public record through the Commission's website. As an intervenor in these proceedings, I have received some compensation from Investor Owned Utilities including Pacific Gas and Electric Company. I have no financial interests in this case that are adverse to those of victims. I have no litigation financing or lines of credit tied to PG&E shareholders, bondholders or any other party in this case. I have not and do not intend to get any compensation for my involvement in this case other than through my claim and those claims of my family through the PG&E Fire Victim Trust. I have not engaged in activities to undermine the value of the Fire Victim Trust or to slow the Trust administration process.

5. After recent press reports and through conducting an online public search of Judge Montali's relationships with victims that received judicial review rights and remedies, I hold the belief that the Honorable Dennis Montali ("Judge Montali") has personal biases and prejudices that are reasonably considered as having interfered with the just administration of this case. I further believe that Judge Montali is unable to be impartial within this case and that Judge Montali holds biases against Abrams and other victims and in favor of certain parties aligned against critical disclosures and discovery within this case (exp. Debtors, Certain Tort Claimant Committee Members, Certain Trust Oversight Committee Members, Certain Fire Claimant Professionals).

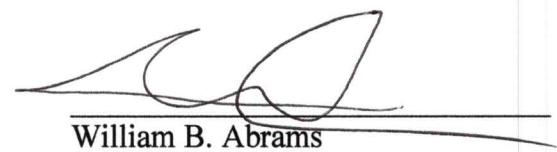
6. The "Exhibit B" attached to the Motion is a true and correct copy of an event announcement posted on the American Bankruptcy Institute Website Journal Article, dated September 13, 2022 entitled "San Francisco Members Enjoy Wine Tasting."

1           7. The "Exhibit C" attached to the Motion is a true and correct copy of an "Order  
2 Published", dated February 7, 2006, Bk. #01-04624-TUC-JMM

3           8. The "Exhibit D" attached to the Motion is a true and correct copy of "Pacific Gas  
4 Bankruptcy News: Issue #1", April 7, 2001, Case#01-30923-DM. Page 14 references Eric Carlson as  
the "Debtors' Financial Advisor"

5           9. I declare under penalty of perjury that, to the best of my knowledge and after  
6 reasonable inquiry, the foregoing is true and correct and that this affidavit was executed at Santa  
7 Rosa, California on November 15, 2022.

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William B. Abrams  
Pro Se Claimant

Sworn to before me this 15th  
day of November, 2022

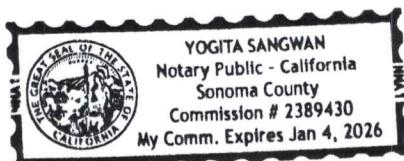
Notary Public

Please see attached  
document 11/15/2022

**CALIFORNIA JURAT****GOVERNMENT CODE § 8202**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Sonoma

Subscribed and sworn to (or affirmed) before me on

this 15 day of November, 20 22, by  
Date Month Year(1) Yogita Sangwan, Notary Public(and (2) William Bradley Abrams),  
Name(s) of Signer(s)proved to me on the basis of satisfactory evidence to  
be the person(s) who appeared before me.

Signature

A handwritten signature of "Yogita Sangwan" over a line.

Signature of Notary Public

Place Notary Seal and/or Stamp Above

**OPTIONAL**

Completing this information can deter alteration of the document or  
fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: United States Bankruptcy Court Northern, district of California San Francisco Division  
Document Date: 11/15/2022 Number of Pages: 3

Signer(s) Other Than Named Above: \_\_\_\_\_